

Attorney Ref No. 112.P91016

Patent Appl. No. 10/726,641

**REMARKS**

This response is a full and complete response to the Office action mailed May 2, 2007. In the present Office action, the Examiner has noted that claims 4, 28, 31, 44, and 48-69 are pending, that claims 4, 31, and 48-69 stand rejected, and that claims 28 and 44 are allowed.

The assignee has amended claims 4, 31, 44, 48, 49, 50, 54, 60, 61, 65, 68, and 69 and added new claims 70 and 71. Support for these claim amendments may be found in the Specification, at least at paragraphs [0034] to [0035], and FIGS 5A and 5B.

Claims 1-3, 5-27, 29-30, 32-43, 45-47, 51-53, 55-59, and 62-64 have been cancelled without prejudice.

In view of both the amendments presented above and the following remarks, it is submitted that the claims pending in the application are novel and nonobvious. It is believed that this application is in condition for allowance. By this response, reconsideration of the present application is respectfully requested.

***Claim Rejections Under 35 U.S.C § 102(b)***

Claims 4 and 31 are rejected under 35 U.S.C. 102(b) as being anticipated by Faraci (U.S. Patent No. 4,985,870). This rejection is respectfully traversed. To anticipate a claim under §102, the applied document must teach each and every element of the claim. "A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." [MPEP §2131.01] Faraci does not teach each and every element of the rejected claims.

The Examiner rejects claims 4 and 31 by asserting that Faraci discloses a plurality of first contact members 24 of a first length, and at least two second contact members 32 and 34 of a second length, wherein the second length is greater than the first length, as shown in Faraci's sole figure.

Attorney Ref No. 112.P91016

Patent Appl. No. 10/726,641

Each of claims 4 and 31, however, recite a plurality of first contact *receptacles* of a first depth and at least two second contact *receptacles* of a second depth, wherein *the second depth is greater than the first depth* such that the second contact receptacles are adapted to contact the external device prior to the first contact receptacles contacting said the external device in response to the board being coupled to the external device through the interface device in a direction. Faraci fails to teach receptacles of varying depth, as set forth in claims 4 and 31. For example, Faraci shows device 29 having a female card edge connector 28, which acts as a receptacle to the metallic traces 24 of the module 10. Failing to meet the claim requirements, the spring contacts 28 within the female card edge connector 28 do not have varying depths that allow some of these contacts 28 to receive the module 10 prior to other contacts 28 receiving the module 10.

Thus, assignee respectfully requests withdrawal of the rejection of claims 4 and 31 under 35 U.S.C. 102(b) in view of the foregoing discussion.

***Claim Rejections under 35 U.S.C. § 103(a)***

Claims 48-53 are rejected under 35 U.S.C. 103(a) as being unpatentable over Faraci (U.S. Patent No. 4,985,870) in view of Banakis et al. (U.S. Patent No. 5,653,596) and Taylor et al. (5,677,511).

Claims 54-64 are rejected under 35 U.S.C. 103(a) as being unpatentable over Ziemkowski (U.S. Patent No. 6,804,119) in view of Samela et al. (U.S. Patent No. 6,220,873).

Claims 65-69 are rejected under 35 U.S.C. 103(a) as being unpatentable over Sausen (U.S. Patent No. 6,626,682) in view of Shuey (U.S. Patent No. 6,494,734).

The Examiner is reminded that to successfully make a *prima facie* rejection under 35 USC § 103, the Examiner must show that Assignee's claimed subject matter would have been obvious to one of ordinary skill in the art pertinent to Assignee's claimed subject matter at the time it was made. See *KSR International, Co. v. Teleflex, Inc.*, 550 U.S. \_\_\_\_ (decided April 30, 2007). Some of the factors to consider in this analysis include the differences between the

Attorney Ref No. 112.P91016

Patent Appl. No. 10/726,641

applied documents and Assignee's claimed subject matter, along with the level of skill associated with one of ordinary skill in the art pertinent to Assignee's claimed subject matter at the time it was made. See USPTO Memo entitled "Supreme Court decision on KSR Int'l. Co., v. Teleflex, Inc.," (May 3, 2007). One way in which an Examiner may establish a prima facie case of unpatentability under 35 USC § 103 would be to show that three basic criteria have been met. First, the Examiner should show that the applied documents, alone or in combination, disclose or suggest every element of Assignee's claimed subject matter. Second, the Examiner should show that there is a reasonable expectation of success from the proposed combination. Finally, the Examiner should show that there was some suggestion or motivation, either in the applied documents themselves or in the knowledge generally available to one of ordinary skill in the art pertinent to the claimed subject matter at the relevant time, to modify the document(s) or to combine document teachings. The motivation or suggestion to make the proposed combination and the reasonable expectation of success should be found in the prior art, and should not be based on Assignee's disclosure. See *In re Vaack*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991); See MPEP § 2142; 2143 - § 2143.03 (regarding decisions pertinent to each of these criteria). It is respectfully asserted that the Examiner has not met these standards.

The Examiner rejects claim 48 by asserting that Faraci discloses an apparatus, comprising a board that includes a plurality of first contact lines 24, two second contact lines having ends extending to the edge of the board, and a third contact line formed adjacent a periphery of the board and having first and second ends extending to the edge of the board. The Examiner continues to assert that additional patents Banakis and Taylor combine with Faraci to teach all of the elements of claim 48.

Claim 48, however, recites a second board including a first surface and a second surface, and a plurality of *contact receptacles* formed on the first surface of the second board to receive the first pins, wherein the plurality of contact receptacles includes *one or more contact receptacles that are deeper than the other contact receptacles*, or the plurality of second pins includes one or more second pins that are longer in length than the other second pins. As discussed above regarding the rejection of claims 4 and 31, Faraci fails to teach contact

*Attorney Ref No. 112.P91016**Patent Appl. No. 10/726,641*

receptacles that are deeper than the other contact receptacles. Thus, assignee requests withdrawal of the rejection of claim 48, and its dependent claims 49 and 50, under 35 U.S.C. 103(a).

The Examiner rejects claims 54 and 60 in view of Ziemkowski and Samela. But Ziemkowski is directed to an edge connector (see Abstract) and lacks teaching contact receptacles, as set forth in claims 54 and 60. Similarly, Samela is directed towards connecting contact traces and host sockets (see Abstract) and also doesn't teach contact receptacles set forth in claims 54 and 60. Thus, assignee respectfully requests withdrawal of the rejection of claims 54 and 60 under 35 U.S.C. 103(a), as well as dependent claim 61, in view of the foregoing discussion.

The Examiner rejects claims 65 in view of Sausen and Shuey. But Sausen is directed to an integrated circuit device socket (as shown in Sausen's figures, for example) and Shuey is directed to multiple-length contact pin assemblies (see Abstract). Neither Sausen nor Shuey, nor their combination, teach a second board including a first surface and a second surface, a plurality of first contact points formed on the first surface of the second board to receive the contact pins, and a plurality of second pins formed on the second surface of the second board, the plurality of second pins adapted to be coupled to integrated circuit contact points, as set forth in claim 65. Thus, assignee respectfully requests withdrawal of the rejection of claim 65 under 35 U.S.C. 103(a), as well as dependent claims 66-69, in view of the foregoing discussion.

It is noted that claimed subject matter may be patentably distinguished from the applied documents for additional reasons; however, the foregoing is believed to be sufficient to overcome the Examiner's rejections discussed above.

Further, it is noted that the Assignee's failure to comment directly upon any of the positions asserted by the Examiner in the office action does not indicate agreement or acquiescence with those asserted positions since the Examiner's other positions are believed to be moot in light of the foregoing..

**RECEIVED  
CENTRAL FAX CENTER**

Attorney Ref No. 112.P91016

**AUG 02 2007**

Patent Appl. No. 10/726,641

**CONCLUSION**

In view of the foregoing, it is respectfully submitted that all the claims pending in this patent application are in condition for allowance. Reconsideration and allowance of all the claims are respectfully solicited.

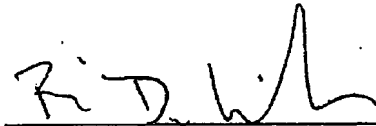
If, however, the Examiner believes that there are any unresolved issues requiring adverse final action in any of the claims now pending in the application, it is requested that the Examiner telephone Brian D. Wichner at (503) 439-6500 so that appropriate arrangements can be made for resolving such issues as expeditiously as possible.

In the event there are any errors with respect to the fees for this response or any other papers related to this response, the Director is hereby given permission to charge any shortages and credit any overcharges of any fees required for this submission to Deposit Account No. 50-3703.

Respectfully submitted,

Dated: 8-2-2007

By



Brian D. Wichner, Patent Agent  
Registration No. 52,359

Customer No. 43831  
Berkeley Law and Technology Group, LLP  
17933 NW Evergreen Parkway, Suite 250  
Beaverton, OR 97006  
Phone: 503.439.6500

cc: Docketing